UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

CAROLYN WITT, et al.

Plaintiffs,

v. Civil Action No. 3:15cv00386-REP

CORELOGIC SAFERENT, LLC, et al.

Defendants.

DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' SECOND AMENDED COMPLAINT OR, IN THE ALTERNATIVE, TO TRANSFER VENUE

Defendants, CoreLogic SafeRent, LLC and CoreLogic National Background Data, LLC, by counsel, and pursuant to Fed. R. Civ. P. 12(b)(3), 12(b)(6), and 28 U.S.C. § 1406(a), submit this Motion to Dismiss Plaintiffs' Second Amended Complaint, or in the Alternative, to Transfer Venue. The reasons in support of the motion are set forth in the accompanying memorandum.

WHEREFORE, Defendants, CoreLogic SafeRent, LLC and CoreLogic National Background Data, LLC, request that the Court enter an order: (1) dismissing the claims of the Newly Named Plaintiffs with prejudice; and (2) dismissing the remaining claims of Plaintiff Witt for improper venue.

CORELOGIC SAFERENT, LLC CORELOGIC NATIONAL BACKGROUND DATA, LLC

By:/s/ Timothy J. St. George

Of Counsel

Alan D. Wingfield (VSB No. 27489)
David N. Anthony (VSB No. 31696)
Timothy J. St. George (VSB No. 77349)
TROUTMAN SANDERS LLP
1001 Haxall Point
Richmond, Virginia 23219
Telephone: (804) 697-1200
Facsimile: (804) 698-1339
alan.wingfield@troutmansanders.com
david.anthony@troutmansanders.com
tim.stgeorge@troutmansanders.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of February, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

Leonard A. Bennett, Esq. Susan M. Rotkis, Esq. CONSUMER LITIGATION ASSOCIATES, P.C.

763 J. Clyde Morris Blvd, Suite 1A

Newport News, VA 23601 Telephone: (757) 930-3660 Facsimile: (757) 930-3662 Email: len@clalegal.com

Counsel for Plaintiffs

Matthew J. Erausquin, Esq. Casey S. Nash, Esq. CONSUMER LITIGATION ASSOCIATES, P.C. 1800 Diagonal Rd Suite 600 Alexandria, VA 22314 Telephone: (703) 273-7770

Facsimile: (888) 892-3512 Email: matt@clalegal.com Email: casey@clalegal.com

Counsel for Plaintiffs

Dale W. Pittman, Esq. THE LAW OFFICE OF DALE W. PITTMAN, P.C.

The Eliza Spotswood House 112-A West Tabb St. Petersburg, VA 23803 Telephone: (804) 861-6000 Facsimile: (804) 861-3362

Email: dale@pittmanlawoffice.com

Counsel for Plaintiffs

James Arthur Francis, Esq. David A. Searles, Esq. FRANCIS & MAILMAN PC Land Title Building 100 S Broad Street, 19th Floor Philadelphia, PA 19110 Telephone: 215-735-8600

Facsimile: 215-940-8000

Email: jfrancis@consumerlawfirm.com

Counsel for Plaintiffs

/s/ Timothy J. St. George

Timothy J. St. George Virginia State Bar No. 77349 TROUTMAN SANDERS LLP 1001 Haxall Point

Richmond, Virginia 23219 Telephone: (804) 697-1254

Facsimile: (804) 698-6013

Email: tim.stgeorge@troutmansanders.com